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**Date:** September 9, 2004 **BQA Memo 04-025**

**To:** Community Based Residential Facilities **CBRF - 10**  
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**From:** Susan Larsen, Director  
Office of Caregiver Quality

**cc:** Cris Ros-Dukler, Director **Cross Reference - 04-014**  
Bureau of Quality Assurance

**Wisconsin Nurse Aide Training, Testing and Registry Update**

This memo provides updated policy information regarding Wisconsin's Nurse Aide Program, including the nurse aide standardized competency test and Registry services, administered by the Department of Health and Family Service's contractor, Promissor, Inc. This memo includes the following topics:

- Promissor's National Nurse Aide Assessment Program (NNAAP™) Examination Changes
- Nurse Aide Competency Testing Policy Changes
- Nurse Aide Student Employment Eligibility Changes
- Nurse Aide Test Site and Evaluator Update
- Nurse Aide Training and Competency Testing Refresher Sessions
- Nurse Aide Training and Registry Website Updates

**NNAAP Skills Examination Update**

Promissor's National Nurse Aide Assessment Program (NNAAP™) Examination, administered in 24 states, is a competency evaluation test designed to meet federal nurse aide testing requirements to measure nurse aide related knowledge, skills and abilities. The examination is composed of both a written or oral examination and a skills demonstration evaluation. Wisconsin is able to compare nurse aide test pass rates on a national basis.

During the past year, the Bureau of Quality Assurance and Wisconsin Nurse Aide Test and Registry Stakeholders thoroughly reviewed the NNAAP™ Skills Examination and provided feedback to Promissor. Selected WTCS campuses also piloted several proposals to evaluate the most effective method to administer the Skills Examination. BQA and Promissor reviewed and evaluated all aspects of the NNAAP™ Examination testing procedures. Wisconsin Nurse Aide Testing and Registry stakeholders have reviewed recommendations.

**Effective October 1, 2004, Promissor evaluators will begin applying the following testing policies:**

- The timed Skills Examination will increase from 25 minutes to **30 minutes**.
- The handwashing skill will increase the minimum time for the critical element step of "lathering all surfaces of fingers and hands, including above the wrists, producing friction" from 10 to **15 seconds**. Increasing this step of the handwashing skill to 15 seconds meets the most recent Center of Disease Control (CDC) hand hygiene guidelines.
- The testing deadline for nurse aide students increases from 120 days of enrollment in the training program to **one year from nurse aide training program completion**.

It is highly recommended that training programs continue to encourage and assist nurse aide candidates to apply with the Wisconsin Nurse Aide Testing Services (WNATS) to schedule their competency exam as soon as possible after successfully completing the training program. Testing promptly after training, while information and skills remain fresh, will improve the probability of passing the competency exam. The one-year testing deadline mirrors that of many other states and allows candidates to delay testing due to personal or physical reasons. **If the candidate has not successfully tested within the one-year timeframe, s/he must successfully complete a new training program.**

BQA and Promissor have reviewed and revised the nurse aide forms and the Wisconsin Nurse Aide Candidate Handbook, based on questions and concerns relayed by training programs and students, and to reflect the current training and test administration policy updates. Promissor has published the revised Handbook and forms and will issue a small sample to all approved nurse aide training programs soon.

**Nurse Aide Student Employment Eligibility**

The extended competency test deadline does **not** change the requirement that allows nurse aide students to be employed for up to 120 days upon enrollment in an approved nurse aide training and competency evaluation program. Under 146.40(2), Wis. Stats., nursing homes, intermediate care facilities for mentally retarded, hospitals, home health agencies or hospices (whether or not certified providers of medical assistance) are allowed to employ nurse aide students for up to 120 calendar days (i.e., four months). Students must be under the "direct supervision" of an RN. Direct supervision requires the RN to oversee the performance of the nurse aide student by being on the same floor or unit as the student, but not necessarily side-by-side. In home health agency and hospice settings the RN would need to oversee the student in the patient's home. **By the 120th day of employment, the nurse aide student must have successfully passed the NNAAP™ Exam and be placed on the Wisconsin Nurse Aide Registry in order to continue employment to provide nursing related services.** In addition, if the nurse aide candidate **fails** either the written exam or the skills demonstration prior to the 120 days, **s/he is no longer allowed to provide nursing related services**, until successfully passing the competency test.

In addition, CFR 483.75(e)(4), details the federal nurse aide student employment requirements, stating: "A facility must not use any individual who has worked less than four months as a nurse aide in that facility unless the individual ... is a full-time employee in a State approved training and competency evaluation program..." CMS has clarified this employment requirement applies to federally certified nursing homes and full-time employment is defined as "35 hours per week." The training program instructor must have determined the student to be proficient in performing the assigned skill. In addition, the employed student must be under the direct supervision of a registered nurse (RN). Within four months, the employed nurse aide student must have successfully passed the nurse aide training program, competency test and be included on the Nurse Aide Registry. At this point, the facility is no longer restricted to full-time employment of the aide.

In 1990, when implementing Wisconsin's nurse aide requirements, BQA established one employment policy for both long term care and non-long term care facilities. The Department has reviewed these policies, to ensure they still meet today's health care and workforce needs. Facilities have relayed that many nurse aide students, especially high school students are unable to work as a nurse aide on a full-time basis. The Department's Office of Legal Counsel has confirmed the federal full-time employment requirement only applies to long term care facilities.

In response to current workforce issues, while still addressing concerns regarding resident and patient safety, the employment policy has been revised to **allow hospitals to hire students enrolled in a nurse aide training program to work on a part-time basis. Part-time employment is defined as "at least 16 hours per week."** Hospitals must ensure the nurse aide students are under the direct supervision of an RN and require the RN to oversee the performance of the nurse aide student by being on the same floor or unit at the student, but not necessarily side-by-side. Hospitals must ensure the nurse aide students are under the direct supervision of an RN and require the RN to oversee the performance of the nurse aide student by being on the same floor or unit at the student, but not necessarily side-by-side. It is anticipated that this policy change will help meet the needs of nurse aide students who attend high school or may have difficulty working a full-time schedule.

### **Nurse Aide Test Sites and Evaluator Update**

As of August 2004, Promissor's has established:

- 38 Regional Test Sites
- 84 In-Facility Test Sites
- 120 Nurse Aide Evaluators

Due to current nursing shortages, there still remains a need for additional nurse aide evaluators in some areas of the state, particularly in the La Crosse area. Please see the [attached Nurse Aide Evaluator Information document](#). If you are interested in becoming a nurse aide evaluator, please contact Dorothy Fiorino, the WNATS Director, at (877) 290-3499 or Violet Moran, the WNATS In-State Administrator, (608) 241-1018 for more information.

### **Nurse Aide Training and Registry Website Updates**

Please access the Department's web site at [dhfs.wisconsin.gov](http://dhfs.wisconsin.gov), Click on "Topics A-Z," then click on "N" to access the Department's [Nurse Aide Training and Registry website](#). [The Wisconsin Nurse Aide Training Program & Registry Manual](#), forms, rules and regulations, approved nurse aide training programs, the Caregiver Misconduct Registry and links to Promissor's website are also located at this site.

### **Contacts**

The following contacts can provide information regarding Wisconsin's nurse aide training, testing and Registry requirements:

Wisconsin nurse aide training program questions:	<b>Cindy Geist, Nurse Consultant</b> Office of Caregiver Quality 2917 International Lane, Suite 300 Madison, WI 53704 1- 608-243-2083
Wisconsin nurse aide test application or scheduling questions:	<b>Wisconsin Nurse Aide Testing Services</b> 4000 East Main Street Columbus, OH 43213-2983 Toll-free phone: 1-877-290-3499
Wisconsin Nurse Aide Registry status questions:	<b>Wisconsin Nurse Aide Registry</b> Managed by Promissor PO Box 13785 Philadelphia, PA 19101-3785 Toll-free phone: 1-877-329-8760